

Paul T. Trimmer
Nevada State Bar No. 9291
Dione C. Wrenn
Nevada State Bar No. 13285
JACKSON LEWIS P.C.
3800 Howard Hughes Parkway, Suite 600
Las Vegas, Nevada 89169
Tel: (702) 921-2460
trimmerp@jacksonlewis.com
dione.wrenn@jacksonlewis.com

*Attorneys for Defendants
Keolis Transit America and
Regional Transportation Commission of
Southern Nevada*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

MANUEL VERMA, an individual, DUANE
USHIJIMA, an individual,

Case No. 2:16-cv-02037-JAD-NJK

Plaintiffs,

vs.

KEOLIS TRANSIT AMERICA, LLC;
DOES 1 through 10 inclusive; ROES
CORPORATIONS/ENTITIES 1 through 10
inclusive; and REGIONAL
TRANSPORTATION COMMISSION OF
SOUTHERN NEVADA; DOES 1 through
10 inclusive; ROES
CORPORATIONS/ENTITIES 1 through 10
inclusive.,

**STIPULATION AND ORDER TO
CONTINUE HEARING ON
DEFENDANTS' MOTION TO DISMISS**

(First Request)

Defendants.

The parties, by and through their respective counsel, hereby stipulate and agree to continue the hearing on Defendants' Motion to Dismiss (ECF No. 13) currently set for December 12, 2016 at 2:30 pm to December 29, 2016, or thereafter as the Court's calendar permits. *

The parties further stipulate and agree that Defendants shall have to and including December 5, 2016 within which to file a Reply in Support of its Motion to Dismiss.

1 This request is prompted by defense counsel's scheduling conflict. Defense counsel needs
2 additional time to review the Plaintiff's opposition to its motion because of counsel's involvement
3 in two representation cases filed with the National Labor Relations Board in the past two weeks.

4 It is necessary to continue the oral argument because Defense counsel will be handling an
5 unfair labor practice trial before the National Labor Relations Board in the matter entitled *Jose*
6 *Escoto and Stratosphere Gaming, LLC* which is expected to take two days.

7 This stipulation and order is sought in good faith and not for the purpose of delay.

8 DATED: November 18, 2016.

9 THE THATER LAW GROUP, P.C.

JACKSON LEWIS P.C.

10
11 _____ /s/ M. Lani Esteban-Trinidad
12 M. Lani Esteban-Trinidad, Bar #6967
13 6390 W. Cheyenne Ave., Suite A
14 Las Vegas, Nevada 89108

15 Attorney for Plaintiffs
16 Manuel Verma and Duane Ushijima

17 _____ /s/ Dione C. Wrenn
18 Paul T. Trimmer, Bar #9291
19 Dione C. Wrenn, Bar #13285
20 3800 Howard Hughes Parkway, Suite 600
21 Las Vegas, Nevada 889169

22 Attorney for Defendants
23 Keolis Transit America, LLC and
24 Regional Transportation Commission of
25 Southern Nevada

26 **ORDER**

27 IT IS SO ORDERED.

28 
U.S. District/Magistrate Judge

DATED: 11/21/2016

*IT IS ORDERED that the motion hearing RE [13] Motion to Dismiss is RESET for
1/4/2017 at 2:00 PM.